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To: EPA8129@epa.state.il.us, Mazin Enwiya/R5/USEPA/US@EPA,  
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EPA8120@epa.state.il.us, Mike Joyce/R5/USEPA/US@EPA,  
Thomas Krueger/R5/USEPA/US@EPA  
cc:  
Subject: Re: Comments on SOW for the Ellsworth Industrial Park site

**EPA Region 5 Records Ctr.**



**265572**

Carol and Mark,

I believe that we typically include language on community relations only in the AOC rather than the SOW. I sent Mark Gurnik some language I had added to the AOC that comes from a recent USEPA model. While it isn't exactly the same as the Indian Refinery language, I think it makes the same points. As for the other SOW comments we just received from Mark Gurnik:

- 1) I will revise the AOC to provide for submission of at least two copies of all documents to IEPA. Mazin, do you want to specify a number of copies to USPA, too?
- 2) Does the second comment relate to some sort of natural resources damages survey, or did you have something different in mind?
- 3) The CRP is really prepared by the Agencies rather than the PRPs, so I continue to believe that the AOC language reinforcing that they must help as asked, but that the community relations activities are at the discretion of the government, is all we need. Please let me know if you think we need to discuss this further. I note further that if what you're concerned about is further coordinating the roles of USEPA and IEPA, that wouldn't even have to be in the AOC (it could be in a CA or MOA) and if the AOC language will be used to clarify Agency responsibilities, too, this can be done during the negotiation period. Since it doesn't really effect the PRPs it's unlikely they will be concerned about such revisions.
- 4) I have also asked Mazin to go back and refine the dates and make them consistent with the AOC. I do not believe this schedule does (or should) put deadlines on the Agencies to complete their document reviews.

Tom Krueger  
USEPA Region 5  
ORC

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>In the absence of a formal meeting with U.S. EPA to discuss just how the  
>details of Community Relations will be handled among the two agencies  
>(and prior to having a discussion with our Director), Kurt and I would  
>like to offer that a "place holder" of sorts should be added to the  
>statement of work to describe Community Relations Activities. It  
>should say, for the time being, that Community Relations Activities  
>will be conducted by U.S. EPA and Illinois EPA. The language that we  
>passed along last time, from U.S. EPA's Admin. Order for Indian  
>Refinery is suggested as more detailed language. It is consistent with  
>the U.S. EPA guidance doc: "Community Relations in Superfund." As we  
>discussed before, there should probably also be some language about the  
>fact that the PRPs will have responsibility to meet NCP requirements  
>about public noticing certain steps in the investigation and  
>remediation processes.

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>I am leaving for a site visit, and I have not had the opportunity to  
>speak with Mike Joyce about these comments.

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